



PROGRESS REPORT NO. 153

TO: Monica Tonel, U.S. Environmental Protection Agency (EPA) – via Email
Kathryn Cerise, EPA – via Email

FROM: Kris McCaig, Teck American Incorporated (TAI)

Cc: Denise Mills, TAI – via Email

DATE: April 12, 2019

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 153 Month Ending March 2019

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Northern Pike Tissue Study – TAI received a letter from EPA on March 11, 2019 with comments on the Draft Northern Pike Tissue Study data summary report (DSR). TAI revised the document and at the time of writing, provided a redline strikeout version of the draft final DSR and response to comments to EPA on April 4, 2019. TAI received a letter from EPA on April 5, 2019 in which EPA approved the draft final DSR and requested TAI finalize and distribute the document by April 30, 2019.

Plant Tissue Study – TAI received a letter from EPA on March 22, 2019 with comments on the draft Plant Tissue Study DSR. At the time of writing, TAI, EPA and the Colville Confederated Tribes held a conference call on April 8, 2019 to discuss the comments and for TAI to seek clarification and feedback on suggested revisions.

Soil Amendment Technology Evaluation Study (SATES) – TAI continued coordination with the SATES team and Kira Lynch, Superfund Technology Liaison with the Office of Research and Development, Office of Science and Policy during the month.

TAI submitted the draft Phase II work plan to EPA for review on March 15, 2019. At the time of writing, TAI participated in a call with the SATES team on April 2 to discuss comments and questions on the draft Phase II work plan and proposed study approach, and received written comments on the draft work plan from SATES team

members by April 4, 2019. TAI received an email from Kira Lynch on April 8, 2019 with notification that there are no further comments on the draft work plan. TAI will prepare a response to comments for EPA review by April 18, 2019.

TAI participated in a call with EPA on March 8, 2019 to discuss the biochar research that EPA Office of Research and Development (ORD) is proposing to conduct with EPA funding from the ORD Regional Applied Research Effort (RARE) Program to further evaluate the potential applicability of biochar for lead remediation in soils. On March 28, 2019, TAI received the draft QAPP for the proposed RARE biochar research and will provide comments to EPA in April.

Baseline Ecological Risk Assessment:

Soil Toxicity Reference Values (TRVs) – TAI submitted a revised approach for developing soil TRVs to EPA on March 22, 2019, along with a response to comments received from EPA on December 24, 2018.

Fish Diet TRVs – TAI received an electronic mail message from EPA on March 25, 2019 with approval to finalize the Fish Diet TRV document.

Wildlife TRVs – TAI received a letter from EPA dated March 28, 2019 with comments on the February 6, 2019 revised draft final document and is reviewing and evaluating the comments.

Sediment and Porewater TRVs – TAI and EPA held a Sediment and Porewater TRV workshop in Spokane on March 5-6, 2019 to work through EPA's comments on the October 2019 draft final TRV document. Follow up actions will occur in the coming months.

Chemicals of Potential Concern (COPC) Refinement Document – TAI delivered a revised draft final COPC Refinement for Aquatic and Terrestrial Receptors to EPA on February 22, 2019 in response to a letter dated November 20, 2018 from EPA with comments on the July 2018 draft final document.

Phase 3 Sediment Study:

TAI received comments from EPA via electronic mail on March 18, 2019 on the draft final technical memorandum for the Porewater Sampling Pilot Study and submitted a revised document and response to comments to EPA on March 27, 2019.

TAI received comments from EPA on the draft final technical memorandum titled Draft Sediment Facies Maps for Upper Reach Operable Unit Areas of Interest Upper Columbia River Phase 3 Sediment Study on March 18, 2019 submitted a revised draft final to EPA on March 25, 2019. At the time of writing TAI received further comments from EPA on the March 25 version of the memo and will revise.

TAI and EPA held a Phase 3 Sediment Study Data Quality Objective (DQO) workshop in Spokane, WA on March 13-14, 2019 to discuss the draft final DQOs 2 through 5

submitted to EPA on March 13, 2019. Follow up calls occurred on March 29, April 3 and April 12 and more calls are planned to allow for continued discussion around EPA's comments during April. At the time of writing EPA submitted draft comments to TAI on April 11 (DQO 2) and 12 (DQOs 3-5) to aid in the discussions.

TAI sent an electronic mail message to EPA on March 22, 2019 to begin coordination of the Phase 3 Sediment Study Facies Mapping field work for 2019.

Human Health Risk Assessment (HHRA):

TAI received an electronic mail message from EPA on March 20, 2019 with an attached document containing EPA's response to TAI comments on the Draft River-Associated HHRA, Upper Columbia River Site, June 29, 2018. EPA indicated that the Draft River HHRA will not be updated, rather the changes shown in the Response to Comments will be incorporated in the Draft Baseline Site-wide HHRA.

TAI received a letter dated March 20, 2019 transmitting the Draft Final Tribal Use Survey Data Analysis Report for TAI review and comment.

TAI received an electronic mail message from EPA on March 29, 2019 in response to TAI's March 4, 2019 electronic mail message requesting the datasets that SRC used to generate tables and figures in the Draft Final Recreational Use Survey Data Analysis Report.

TAI received a letter from EPA dated March 29, 2019 transmitting the Draft Upland Human Health Risk Assessment for the Upper Columbia River Site for TAI review and comment.

Data Management Plan – TAI submitted the revised Draft Final Data Management Plan for the UCR Site RI/FS to EPA on March 28, 2019 and at the time of writing, received a letter from EPA on April 3, 2019 that identified three previously submitted EPA comments that EPA found were not addressed by TAI. TAI is currently reviewing and evaluating the comments.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.